

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

HILARY PHILLIPS,

*

Plaintiff,

*

v.

*

Civil No.: PX-19-00653

STATE OF MARYLAND, ET AL.

*

Defendants.

*

* * * * *

**DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO FILE
AMENDED COMPLAINT**

Defendants State of Maryland and Maryland Department of Health (collectively, "Defendants"), by and through undersigned counsel, submit this Opposition to Plaintiff's Motion for Leave to File Amended Complaint and state as follows:

1. Plaintiff Hilary Phillips's Motion for Leave to File Amended Complaint must be denied because the proposed Amended Complaint fails to state a claim upon which relief can be granted on her claim under the Rehabilitation Act of 1973.
2. Defendants' memorandum of law is incorporated by reference herein.

Wherefore, Defendants respectfully request that this Court deny Plaintiff's Motion for Leave to File Amended Complaint and dismiss this matter with prejudice.

Respectfully submitted,

BRIAN E. FROSH
ATTORNEY GENERAL OF MARYLAND

/s/

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of May 2019 a copy of Defendants' Opposition to Plaintiff's Motion for Leave to File Amended Complaint and this Certificate were electronically served on all those entitled to service via the Court's electronic filing system.

BRIAN E. FROSH
ATTORNEY GENERAL OF MARYLAND

/s/

Christopher A. Gozdor
Assistant Attorney General
Federal Bar No.16136